

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Emily Doe)	Civil Action No.: 4:20-cv-04445-SAL
)	
Plaintiff)	
vs.)	
)	
American University of Antigua Inc.,)	
)	
Defendant)	
)	

CONSENT MOTION:
EXTENSION OF TIME TO FILE
SUPPLEMENTAL MEMORANDUM IN
SUPPORT OF CLAIM FOR PERSONAL
JURISDICTION

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6.01 (DSC), Plaintiff Emily Doe, by and through undersigned counsel, and with the consent of Defense Counsel (attached as Exhibit A), hereby moves this Court for a fourteen (14) day extension of time, to run from the date of filing of the instant motion, within which Plaintiff may file a Supplemental Memorandum in Support of the claim that this Court has personal jurisdiction. (Text Order ECF 24). The Supplemental Memorandum is currently due on September 15, 2021, and an extension of fourteen (14) days would make the reply due on September 28, 2021.

On August 10, 2021, at the request of the Defendant, Plaintiff's original written discovery served on August 20, 2021 was amended and Defendant received the full 30 days response time to respond, making responses due September 20, 2021. (ECF 27).

Because Defendant has had additional time within which to respond to written discovery, Plaintiff is informed and believes no prejudice to the Defendant or the Court would result from the grant of the requested extension. In addition, Plaintiff is informed and believes that good cause exists for the extension sought.

In accordance with Local Rule 7.02 (DSC) Plaintiff's counsel conferred with counsel for Defendant and Counsel for Defendant does not object to the request for extension of time.

For the reasons set forth above, Plaintiff respectfully requests an extension of time of fourteen (14) days to file Supplemental Memorandum in Support of Personal Jurisdiction, such is currently September 15, 2021. If granted, the new date for filing of a Supplemental Memorandum on September 29, 2021.

Plaintiff reserves the right to seek an additional extension based on Defendant's service of Motions for Protective Order Quash subpoenas issued by Plaintiff to third parties (on issues related solely to personal jurisdiction) which motion was filed August 31, 2021 and had not yet been heard.

Respectfully submitted,

s/ Desa Ballard

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September 13, 2021